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NAS JACKSONVILLE
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REQUEST TO ADD PROPYLENE GLYCOL DINITRATE ANALYSIS TO PHASE 1 REMEDIAL INVESTIGATION SAMPLING OF POTENTIAL SOURCE OF CONTAMINATION 38 NAS JACKSONVILLE FL
1/24/2012
NAVFAC SOUTHEAST

DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST
JACKSONVILLE, FL 32212-0030

January 24,2012

Mr. David Grabka
FDEP Bob Martinez
Division of Waste Management
Federal Programs Section
2600 Blairstone Road
Mail Station 4535
Tallahassee, FL 32399-2400

Dear Mr. Grabka:

SUBJECT: FIELD CHANGES FOR PSC 38 NAS JACKSONVILLE

NAVFACSE agrees with Enclosure (1), the field change request. This request indicates the locations of the 6 new wells. This addition is based on a request from FDEP to add PGDN analysis to areas where the chemical was historically used.

If you have any questions, please contact me at: (904)542-6160 or email: adrienne.wilson@navy.mil. Thank you.

Sincerely,

A. T. WILSON
Restoration Project Manger
South Atlantic Integrated Product Team
By direction of the Commanding Officer

Enclosures:
1. Field Task Modification Request Form
2. Figure with Location of Six New Wells
3. Laboratory Services for PGDN
4. DEP comments dated 13 JAN 12
5. Table 1 New requirements for PGDN (Propylene glycol dinitrate)
6. Change to UFPSAP work sheet #6

Copy to:
Mr. Tim Curtin (NAS Jacksonville)
Mr. Pete Dao (USEPA RPM)
Mr. Dave Grabka (FDEP RPM)
Mr. Eric Davis (CH2MHill)

TETRA TECH
FIELD TASK MODIFICATION REQUEST FORM

NAS JACKSONVILLE Project/Installation Name	JM19 112G02686 CTO & Project Number	1 Task Mod. Number
UFP SAP Modification To (e.g. Work Plan)	PSC 38 Site/Sample Location	 Date

Activity Description: SIX ADDITIONAL SAMPLING LOCATIONS WILL BE ADDED TO THE SAMPLING STRATEGY PER FDEP, AND ANALYZED FOR PROPYLENE GLYCOL DINITRATE (PGDN).

Reason for Change: THE ADDITION IS BASED ON A REQUEST FROM FDEP TO ADD THE PGDN ANALYSIS TO AREAS WHERE CHEMICAL IS USED. THE RATIONAL FOR THE SAMPLE LOCATIONS ARE BASED ON HISTORICAL AND PRESENT USE OF THE CHEMICAL ON SITE.

Recommended Disposition:

Field Operations Leader (Signature) — Date

Approved Disposition:

Project/Task Order Manager (Signature) — Date

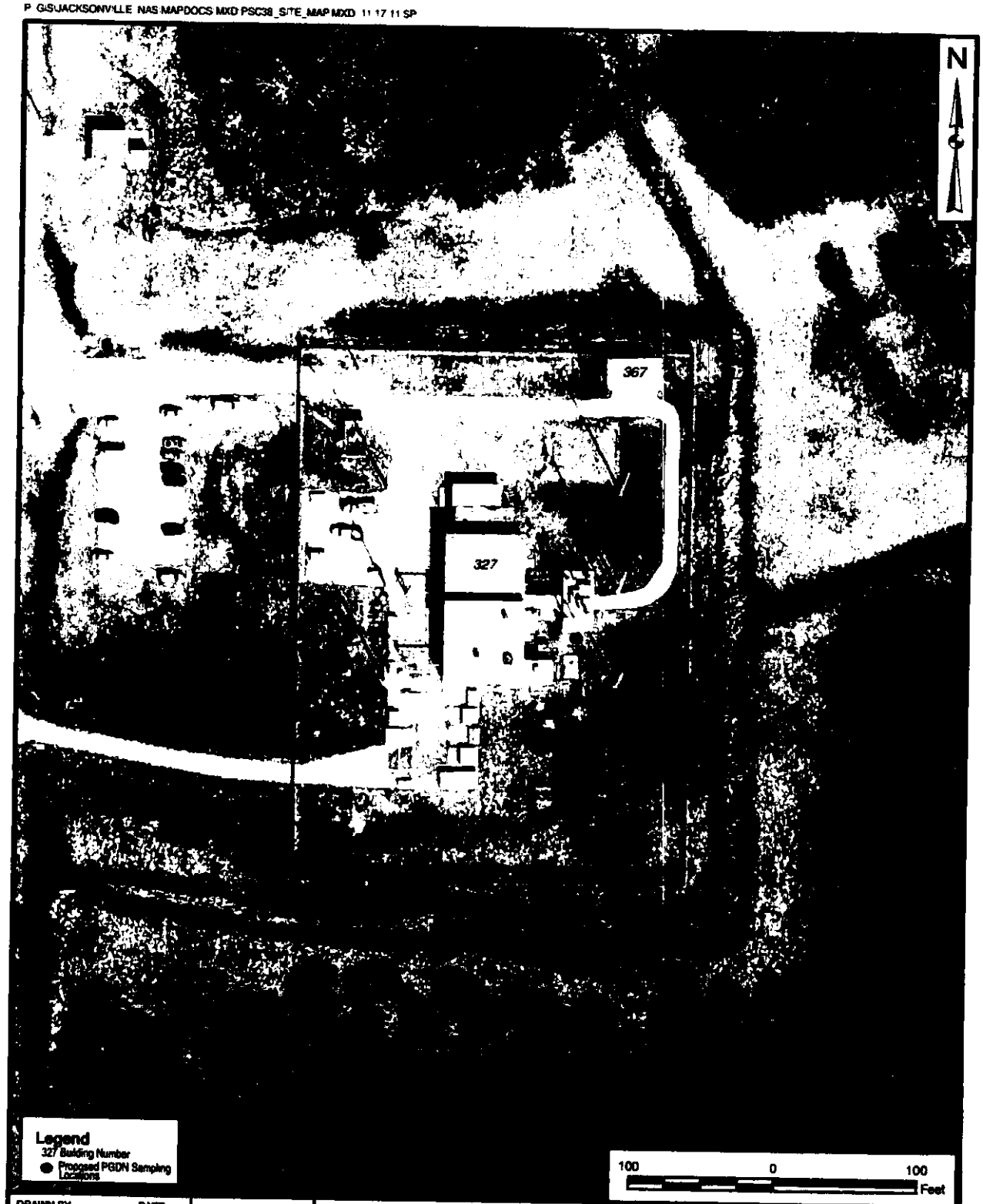
Distribution:

Program/Project File –
Project/Task Order Manager –
Field Operations Leader –

Other:

Encl (1)

P:\GIS\JACKSONVILLE NAS\MAPDOCS\MXD\PSC38_SITE_MAP.MXD 11/17/11 SP



DRAWN BY: J. ENGLISH	DATE: 04/14/10
CHECKED BY: J. JOHNSON	DATE: 11/17/11
REVISED BY: S. PAXTON	DATE: 11/17/11
SCALE: AS NOTED	

NAVFAC

AERIAL SITE PHOTOGRAPH
PSC 38 - TORPEDO REWORK FACILITY
NAS JACKSONVILLE
JACKSONVILLE, FLORIDA

CONTRACT NUMBER: CTO JM19	
APPROVED BY: —	DATE: —
APPROVED BY: —	DATE: —
FIGURE NO: 10-2	REV: 0

Encl (2)

908 North Temperance Ave. • Clovis, CA 93611 • Phone 559-275-2175 • Fax 559-275-4422

Tetra Tech NUS, Inc
Attn: Meg Price - Contract Administrator
234 Mall Boulevard, Suite 260
King of Prussia, PA 19406
Ph.: 610.382.1525
meg.price@tetratech.com

Submitted: October 26, 2011

RE: LABORATORY SERVICES FOR NAS JACKSONVILLE, FLORIDA, COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION - NAVY (CLEAN) CONTRACT N62470-08-D-1001, CONTRACT TASK ORDER (CTO) NO. JM19; PSC 38 OTTO FUEL

On behalf of APPL, Inc., I would like to thank you and Tetra Tech NUS for including our laboratory in this bid solicitation. We are dedicated to providing the highest quality, most legally defensible data to your company for this project. At a minimum, the statement of work has been reviewed by two project managers. And any nonstandard technical concerns have been discussed with the lab director and the appropriate department manager. We thoroughly understand the terms set forth in the request for proposal submitted, any exceptions are noted below:

Notes and Exceptions:

1. APPL Inc. is DoD ELAP certified for PGDN analysis. We are NELAP certified by the State of Florida, however our certification does not include PGDN.
2. Unit pricing includes MS/MSDs at a rate of 5%. MS/MSDs requested more frequently than one in every 20 samples will be billed at the unit rate.
3. Soil samples will be reported on a dry-weight basis.
4. Please allow five days when submitting container requests. APPL, Inc. assumes the cost of ground shipments. Rush shipments are billed to the client.
5. It is APPL Inc.'s policy to log in all samples received in one day for the same project into one SDG. For this reason, a single SDG may not contain 20 samples. The number of samples in the SDG will be dependent upon the number of samples shipped by the client. However, multiple SDGs can be combined into one report and EDD deliverable, if requested.
6. We will store unused sample volume and extracts for 60 days after the report is submitted.
7. APPL reporting limits are:

ACODE	AREF	Analyte	LOQ	LOD	DL	AUNIT	CL
$PGDNW	EPA 8330	Propylene glycol dinitrate (PGDN)	0.20	0.1	0.050	ug/L	70-130
$PGDNW	EPA 8330	Surrogate: 1,2-Dinitrobenzene (S)	70-130			ug/L	70-130
ACODE	AREF	Analyte	LOQ	LOD	DL	AUNIT	CL
$PGDNS	EPA 8330	Propylene glycol dinitrate (PGDN)	250	100	50.0	ug/kg	70-130
$PGDNS	EPA 8330	Surrogate: 1,2-Dinitrobenzene (S)	70-130			ug/kg	70-130

General Terms Summary:

1. Sample Matrix: water, soil, concrete
2. Certification: DoD ELAP

Encl(3)

3. Guidance Manuals: DOD QSM v4.2, EPA SW-846
4. Analyte List per SOW, DoD or in house control limits
5. Report: one hard copy and 2 CDs with bookmarked PDF copies of the Level IV report (DoD/CLP format) and PDF copies of the summary report
6. EDD Report: Tetra Tech NUS (TXT) format
7. TAT: 21 Calendar days for hard copy and EDD
8. Sample Schedule: November 2011.

Documents/Items included:

1. Response Letter
2. Table 1, pricing
3. DoD certification

All other terms, conditions, supplies, and scheduling detailed in this RFP are agreed to and easily achieved by our laboratory. If any additional information or clarifications are required, please contact us at your earliest convenience.

Thank you,

Cynthia Clark – Project Manager
cclark@applinc.com

TABLE 1
NUMBER OF SAMPLES/ANALYTICAL METHODS
NAS JACKSONVILLE, FL
CTO JM19, PSC 38

Matrix	Parameter	Method	# Samples	Unit Price	Total Cost
Aqueous QC	PGDN (provide LOQ, LOD, and DL w/ bid)	SW-846 8330Bm	7	$150.00	$1050.00
Soil	PGDN (provide LOQ, LOD, and DL w/ bid)	SW-846 8330Bm	6	$150.00	$900.00

TOTAL COST: $ 1950.00

(1) The laboratory must provide a trip blank and temp blank for every cooler.

New Requirement: Laboratory must use DOD QSM default limits for all methods addressed in the QSM. The laboratory must provide a list of any variances or exceptions to the QSM with their response to this solicitation.

Can the laboratory provide sample pick-up on site? NO (circle one)
If yes is there an additional charge and what is that charge?_____

The laboratory must point out if they are not DOD ELAP accredited for all the methods and analytes requested. Clearly state the methods and or compounds that you are NOT accredited for (if any).

The laboratory must provide copies of their accreditation with their response to this solicitation.

Name of Laboratory APPL Inc.

Signature 

Encl (4)

Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

January 13, 2012

Ms. Adrienne Wilson
Code OPDE3/AW
Department of the Navy
Naval Facilities Southeast
Attn: Ajax Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Final Sampling and Analysis Plan (SAP)(Field Sampling Plan and Quality Assurance Project Plan) for Phase I Remedial Investigation for Potential Source of Contamination 38 (PSC 38), Revision No. 2, Naval Air Station Jacksonville, Jacksonville, Florida

Dear Adrienne:

I have completed my review of the Final Sampling and Analysis Plan (SAP)(Field Sampling Plan and Quality Assurance Project Plan) for Phase I Remedial Investigation for Potential Source of Contamination 38, Revision No. 2, Naval Air Station Jacksonville, dated December 2011 (received December 14, 2012). I have the following comment on the Sampling and Analysis Plan that needs to be corrected before the Department can approve it:

In Section 11.3, page 44, in the description of the vertical boundary of interest for surface soil it says that "The interval of interest for surface soil is 0 to 2 feet bgs for metals and 6 inches to 2 feet bgs for all other analytical groups." It later goes on to say that this is in accordance with FDEP guidance. Rule 62-780.600(5)(c)1., Florida Administrative Code, actually says:

> *If a surficial discharge of metals or semi-volatile organic compounds is known or suspected, the sampling intervals shall be as follows: land surface to six inches, six inches to two feet, and two-foot intervals thereafter.*

Otherwise, the following vertical sampling intervals are directed:

> *Samples shall be collected at two-foot intervals unless the sampling intervals are adjusted, as necessary, to account for factors such as discrete variations in the lithology,*

Encl(6)

depth to the water table, the point of discharge, and the chemical and physical properties of the contaminants.

Please make the necessary revisions to the SAP. Changes to the surface soil sampling intervals will also require changes to Section 14.7, Section 17.2, and Worksheet 18.2.

I also have the following minor comments that should also be corrected in the next revision:

(1) In Section 14.7, third paragraph, page 52, please remove backhoe as a means for collecting surface soil samples. The use of a backhoe as a means to collect surface soil samples is unacceptable except possibly for waste characterization purposes.

(2) In Section 14.7, third paragraph, page 52, it mentions a Site Geologist who is not listed in earlier Worksheets #4 and #7.

In the responses to my previous comments and in Worksheet #9, page 27, it is explained that the sampling and analysis for propylene glycol dinitrate (PGDN) will be done through a field task modification and that a separate laboratory will need to be procured to conduct the analyses. Please submit a work plan for the Department's review that indicates sampling locations, including the rationale for those locations, the laboratory and laboratory method to be used for analyzing for PGDN, etc.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,

David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Pete Dao, EPA Region IV, Atlanta
Tim Curtin, NASJAX
Mark Peterson, TtNUS, Jacksonville
Casey Hudson, CH2M Hill, Atlanta
Tim Bahr, FDEP

JJC___ESN___

SAP Worksheet #6 -- Communication Pathways
(UFP-QAPP Manual Section 2.4.2)

Communication Drivers	Responsible Affiliation	Name	Phone Number and/or E-Mail	Procedure (timing, pathway to & from, etc.)
SAP amendments	Tetra Tech FOL/SSO Tetra Tech PM Navy RPM	Alan Pate Mark Peterson Adrienne Wilson	(904) 730-4669 Ext. 214 (904) 730-4669 Ext. 213 (904) 542-6160	The Tetra Tech FOL will verbally inform the Tetra Tech PM within 24 hours of realizing a need for an amendment. The Tetra Tech PM will document the proposed changes via a Field Task Modification Request (FTMR) form within 5 days and send the Navy RPM a concurrence letter within 7 days of identifying the need for change. SAP amendments will be submitted by the Tetra Tech PM to the Navy RPM for review and approval. The Navy RPM will notify the regulators by mail of changes to the SAP. The Tetra Tech PM will send scope changes to the Partnering Team via e-mail within 1 business day.
Changes in schedule	Tetra Tech PM Navy RPM NAS Jacksonville POC	Mark Peterson Adrienne Wilson Tim Curtin	(904) 730-4669 Ext. 213 (904) 542-6160 (904) 542-4228	The Tetra Tech PM will verbally inform the Navy RPM and the NAS Jacksonville POC on the day that schedule change is known and document via schedule impact letter within 1 business day of when impact is realized.

Encl(a)

Communication Drivers	Responsible Affiliation	Name	Phone Number and/or E-Mail	Procedure (timing, pathway to & from, etc.)
Issues in the field that lead to changes in the scope of work	Tetra Tech FOL/SSO Tetra Tech PM Navy RPM NAS Jacksonville POC	Alan Pate Mark Peterson Adrienne Wilson Tim Curtin	(904) 730-4669 Ext. 214 (904) 730-4669 Ext. 213 (904) 542-6160 (904) 542-4228	The Tetra Tech FOL will verbally inform the Tetra Tech PM on the day that the issue is discovered. The Tetra Tech PM will inform the Navy RPM and the NAS Jacksonville POC (verbally or via e-mail) within 1 business day of discovery. The Navy RPM will issue scope change (verbally or via e-mail), if warranted. The scope change is to be implemented before further work is executed. The Tetra Tech PM will document the change via an FTMR form within 2 days of identifying the need for change and will obtain required approvals within 5 days of initiating the form.
Recommendation to stop work and initiate work upon corrective action	Tetra Tech FOL/SSO Tetra Tech PM Tetra Tech QAM Tetra Tech HSM Tetra Tech Project Chemist Navy RPM NAS Jacksonville POC	Alan Pate Mark Peterson Tom Johnston Matt Soltis Shauna Stotler-Hardy Adrienne Wilson Tim Curtin	(904) 730-4669 Ext. 214 (904) 730-4669 Ext. 213 (412) 921-8615 (412) 921-8912 (803) 641-4944 (904) 542-6160 (904) 542-4228	If Tetra Tech is the responsible party for a stop work command, the Tetra Tech FOL will inform on-site personnel, subcontractor(s), the NAS Jacksonville POC, and the identified Partnering Team members within 1 hour (verbally or by e-mail). If a subcontractor is the responsible party, the subcontractor PM must inform the Tetra Tech FOL within 15 minutes, and the Tetra Tech FOL will then follow the procedure listed above.

Communication Drivers	Responsible Affiliation	Name	Phone Number and/or E-Mail	Procedure (timing, pathway to & from, etc.)
Corrective action for field program	Tetra Tech QAM Tetra Tech PM Navy RPM	Tom Johnston Mark Peterson Adrienne Wilson	(412) 921-8615 (904) 730-4669 Ext. 213 (904) 542-6160	The Tetra Tech QAM will notify the Tetra Tech PM verbally or by e-mail within 1 business day that the corrective action has been completed. The Tetra Tech PM will then notify the Navy RPM (verbally or by e-mail) within 1 business day.
Field data quality issues	Tetra Tech FOL/SSO Tetra Tech PM	Alan Pate Mark Peterson	(904) 730-4669 Ext. 214 (904) 730-4669 Ext. 213	The Tetra Tech FOL will inform the Tetra Tech PM (verbally or by e-mail) on the same day that a field data quality issue is discovered.
Analytical data quality issues	Laboratory PM Tetra Tech Project Chemist Tetra Tech PM Navy RPM	Kim Kostzer Shauna Stotler-Hardy Mark Peterson Adrienne Wilson	(615) 345-1115 (803) 641-4944 (904) 730-4669 Ext. 213 (904) 542-6160	The Laboratory PM will notify (verbally or via e-mail) the Tetra Tech Project Chemist within one business day of when an issue related to laboratory data is discovered. The Tetra Tech Project Chemist will notify (verbally or via e-mail) the data validation staff and the Tetra Tech PM within one business day. Tetra Tech DVM or Project Chemist notifies Tetra Tech PM verbally or via e-mail within 48 hrs of validation completion that a non-routine and significant laboratory quality deficiency has been detected that could affect this project and/or other projects. The Tetra Tech PM verbally advises the NAVFAC RPM within 24 hours of notification from the project chemist or DVM. The NAVFAC RPM takes corrective action that is appropriate for the identified deficiency. Examples of significant laboratory deficiencies include data reported that has a corresponding failed tune or initial calibration verification. Corrective actions may include a consult with the NAVFAC Navy Chemist.